

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION

UNITED STATES OF AMERICA :
 :
 v. : CRIMINAL ACTION
 :
 TERRY EUGENE PEACE : NO. 4:14-CR-11-1-HLM-WEJ

DEFENDANT PEACE'S UNOPPOSED MOTION TO SEAL SENTENCING
MEMORANDUM AND EXHIBITS

The Defendant, TERRY EUGENE PEACE, through undersigned counsel, hereby requests that this Court issue an order directing the Clerk of Court to file the imminent *Defendant Peace's Sentencing Memorandum* under seal. In support of the motion, counsel offers the following:

1. This Court will conduct a sentencing hearing in this case late next week, on August 28, 2015. Mr. Peace pled guilty to Count Two of the superseding indictment. Defense counsel has prepared a sentencing memorandum for the Court and is prepared to file it in the near future. However, within that memorandum, counsel discusses several topics which are sensitive in nature, including personal details about Mr. Peace, including the following: Mr. Peace's military service, his psychiatric conditions and treatment, and details of the crime itself. With the memorandum, counsel intends to include a series of exhibits, including a psychiatric evaluation. Public disclosure of the information — through a public filing of the

sentencing memorandum and exhibits — may cause Mr. Peace unnecessary embarrassment and other harm.

2. Undersigned counsel has conferred with the government regarding this motion and Assistant United States Attorney Tracia King does not oppose the motion to file the sentencing memorandum under seal.

WHEREFORE, the Defendant respectfully requests that the upcoming *Defendant Peace's Sentencing Memorandum* be filed under seal and has attached a proposed order for the Court's review.

Respectfully submitted, this the 20th day of August, 2015.

Respectfully submitted,

/s/ W. Matthew Dodge

W. Matthew Dodge
Attorney for Terry Eugene Peace
Georgia State Bar No. 224371

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing motion was formatted in Goudy Old Style 14 pt., in accordance with Local Rule 5.1C, and was electronically filed this day with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to Tracia King and Ryan Buchanan, Assistant United States Attorneys, 600 Richard B. Russell Building, 75 Spring Street, S.W., Atlanta, Georgia, 30303, as well as counsel for each of the two co-defendants.

Respectfully submitted, this the 20th day of August, 2015.

/s/ W. Matthew Dodge
W. Matthew Dodge